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and Watch Tower Bible and Tract Society of Pennsylvania*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA	)	Cause No. CV 20-52-BLG-SPW
MAPLEY,	)	
	)	
Plaintiffs,	)	<b>DEFENDANTS WATCH TOWER</b>
	)	<b>BIBLE AND TRACT SOCIETY OF</b>
	)	<b>PENNSYLVANIA'S AND</b>
vs.	)	<b>WATCHTOWER BIBLE AND</b>
	)	<b>TRACT SOCIETY OF NEW YORK,</b>
WATCHTOWER BIBLE AND	)	<b>INC.'S REQUEST FOR ORAL</b>
TRACT SOCIETY OF NEW YORK,	)	<b>ARGUMENT ON PLAINTIFFS'</b>
INC., WATCH TOWER BIBLE AND	)	<b>MOTION TO COMPEL</b>
TRACT SOCIETY OF	)	<b>JURISDICTIONAL DISCOVERY</b>
PENNSYLVANIA, and BRUCE	)	<b>RESPONSES AND FOR COSTS</b>
MAPLEY SR.,	)	<b>AND FEES (DOC. 56)</b>
	)	
Defendants.	)	
	)	
	)	
	)	
	)	

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF NEW YORK,  
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant. )

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Defendants Watch Tower Bible and Tract Society of Pennsylvania (hereinafter “WTPA”) and Watchtower Bible and Tract Society of New York, Inc. (hereinafter “WTNY”), by and through their attorneys, hereby respectfully request this Court to set a date and time for oral argument on Plaintiffs’ Motion to Compel Jurisdictional Discovery Responses And For Costs And Fees (Doc. 56).

On April 20, 2021, Plaintiffs filed their Motion to Compel Jurisdictional Discovery Responses And For Costs And Fees (hereinafter “Pl.’s MTC Jurisdictional Discovery”) along with a supporting Brief. *See* Docs. 56-57. On May 11, 2021, WTPA and WTNY filed their joint Response Brief in Opposition to Pl.’s MTC Jurisdictional Discovery. *See* Doc. 67. Plaintiffs filed their Reply Brief on May 25, 2021. *See* Doc. 72. As such, briefing on Pl.’s MTC Jurisdictional Discovery is complete.

In light of the foregoing procedural background and pursuant to Rule 6(c)(1), Fed.R.Civ.P. and L.R. 7.1(e), WTPA and WTNY respectfully request this Court set a date and time for oral argument on Pl.'s MTC Jurisdictional Discovery. Given the issues Plaintiffs have raised in their briefing and the impact any ruling from this Court will have on remaining jurisdictional discovery, WTPA and WTNY respectfully request the opportunity to be heard on the record. WTPA and WTNY believe hearing argument from counsel will be beneficial to this Court's analysis of Pl.'s MTC Jurisdictional Discovery.

DATED this 26th day of May, 2021.

By: /s/ Jon A. Wilson

Jon A. Wilson

BROWN LAW FIRM, P.C.

*Attorneys for Defendants Watchtower  
Bible and Tract Society of New York,  
Inc., and Watch Tower Bible and  
Tract Society of Pennsylvania*

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 26, 2021, a copy of the foregoing was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepan  
Ryan R. Shaffer  
James C. Murnion  
MEYER, SHAFFER & STEPANS, PLLP  
430 Ryman Street  
Missoula, MT 59802
3. Bruce G. Mapley Sr.  
3905 Caylan Cove  
Birmingham, AL 35215

by the following means:

<u>1, 2</u> CM/ECF	<u>        </u> Fax
<u>        </u> Hand Delivery	<u>        </u> E-Mail
<u>3</u> U.S. Mail	<u>        </u> Overnight Delivery Services

By: /s/ Jon A. Wilson  
Jon A. Wilson  
BROWN LAW FIRM, P.C.  
*Attorneys for Defendants Watchtower  
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Inc., and Watch Tower Bible and  
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